IN THE UNITED STATES COURT OF FEDERAL CLAIMS

ACTION CAPITAL PROPERTIES,)	
LLLP, et al.,)	
)	Case No. 19-1784L
Plaintiffs,)	
v.)	Hon. Lydia K. Griggsby
)	
UNITED STATES OF AMERICA,)	(E-Filed January 14, 2021)
)	
Defendant		

JOINT STATUS REPORT

Pursuant to the Court's December 3, 2020 Scheduling Order (ECF No. 18), the parties submit this Joint Status Report regarding the status of their settlement efforts.

The parties report that, after the joint appraiser submitted his appraisals, the United States submitted several questions to the joint appraiser concerning his reports. In response the joint appraiser indicated he would provide additional analysis in his appraisal reports. The parties are currently awaiting the joint appraiser's appraisal reports with the additional analysis.

Nonetheless, the parties have continued to engage in settlement negotiations.

Based on the foregoing, the parties propose that they report back to the Court in a Joint Status Report no later than March 12, 2021 on the status of their settlement efforts.

Respectfully submitted this 14th day of January, 2021.

Steward, Wald & McCulley, LLC

/s/ Michael J. Smith

Michael J. Smith Steven M. Wald 12747 Olive Blvd. Suite 280 St. Louis, MO 63141 (314) 720-0220 (314) 899-2925 (facsimile) wald@swm.legal smith@swm.legal

and

Thomas S. Stewart
Elizabeth G. McCulley
2100 Central St. Suite 22
Kansas City, MO 64108
(816) 303-1500
(816) 527-8068 (facsimile)
stewart@swm.legal
mcculley@swm.legal

Attorneys for Plaintiffs

PAUL E. SALAMANCA

Deputy Assistant Attorney General U.S. Department of Justice Environment & Natural Resources Division

/s/ Dustin J. Weisman

DUSTIN J. WEISMAN
ELIZABETH MCGURK
Trial Attorney
Natural Resources Section
4 Constitution Square
150 M Street NE, Room 3.153
Washington, DC 20002

Telephone: (202) 305-0432 Facsimile: (202) 305-0506

E-Mail: dustin.weisman@usdoj.gov E-Mail: elizabeth.mcgurk@usdoj.gov

Attorneys for the United States